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T.R.A. DOCKET ORIGINAL

October 6, 2003

By Overnight Courier

The Honorable Deborah Taylor Tate  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Docket No. 99-00784

Dear Chairman Tate:

NeuStar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA") and on behalf of Tennessee telecommunications industry ("Industry"),<sup>1</sup> hereby withdraws the Industry's notification of a relief plan for the 615 Numbering Plan Area ("NPA") originally filed with the Tennessee Regulatory Authority ("TRA") in the above-referenced docket on August 31, 1999 ("Notification").

On June 17, 2003, NANPA notified the TRA that the 615 NPA is not projected to exhaust within the next five years and as such, pursuant to industry guidelines, the Industry or the TRA may request in writing to NANPA that the Notification be rescinded.<sup>2</sup> Subsequently, on July 22, 2003, NANPA received such a letter from the TRA.<sup>3</sup> The Notification, filed on behalf of the Industry in the above-referenced docket on August 31, 1999, requested that the TRA approve the Industry's recommended all-services distributed overlay relief plan. The Notification stated that according to the 1999 Central Office Code Utilization Survey and NPA Exhaust Analysis, the 615 NPA was projected to exhaust during the fourth quarter of 2000. On June 2, 2003, NANPA released the 2003 NRUF and NPA Exhaust Analysis ("2003 NRUF Analysis"), which incorporated updated actual and projected demand for numbering resources submitted to

<sup>1</sup> The Industry is comprised of telecommunications entities operating in or considering operations within the 615 NPA in Tennessee.

<sup>2</sup> Letter to The Honorable Sara Kyle, Tennessee Regulatory Authority, from Kimberly Wheeler Miller, NeuStar, Inc., (June 17, 2003).

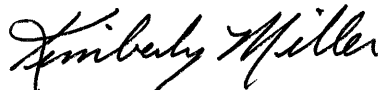
<sup>3</sup> Letter to Kimberly Wheeler Miller, NeuStar, Inc., from Deborah Taylor Tate, Chairman, Tennessee Regulatory Authority (July 22, 2003).

NANPA by the Industry. According to the 2003 NRUF Analysis, the 615 projected exhaust date was pushed back to fourth quarter 2010.<sup>4</sup>

As a result of the TRA's July 22 letter, NANPA convened an Industry conference call on September 9, 2003.<sup>5</sup> During the meeting, the Industry reached consensus to withdraw the relief plan and requested NANPA to forward the consensus decision to the TRA. Therefore, NANPA, on behalf of the Industry, withdraws the Notification of the Industry's relief plan for the 615 NPA.

Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope. If you have any questions regarding this matter, please contact the undersigned at (202) 533-2912.

Respectfully submitted,



Kimberly Wheeler Miller  
Director, Regulatory Law and Public Policy

cc: Lewis DeBoard  
Interested Industry members  
(via NANPA's Document Distribution Service)

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<sup>4</sup> The extension of the projected exhaust is due in part to the implementation of thousands block pooling in March of 2002, and a continued decrease in demand for numbering resources. 2003 NRUF and NPA Exhaust Analysis (June 2, 2003) ("2003 NRUF Analysis"). Due to a change in Federal Communications Commission regulations, the NRUF Analysis replaced the Central Office Code Utilization Survey in 2000. See, *Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 99-200, FCC 00-104 (March 31, 2000) at ¶5.

<sup>5</sup> The meeting minutes are attached as Attachment A.

# **ATTACHMENT A**

**615 NPA – TENNESSEE  
WITHDRAWING RELIEF CONFERENCE CALL  
FINAL – MEETING MINUTES  
SEPTEMBER 9, 2003**

**WELCOME, INTRODUCTIONS & AGENDA REVIEW**

Wayne Milby, Senior NPA Relief Planner – NANPA, opened the meeting with introductions, a review of the agenda and the objectives of the meeting. A list of attendees can be found in Attachment #1.

**REVIEW CONSENSUS PROCESS, MEETING MINUTES AND STATEMENTS FOR THE RECORD**

Mr. Milby stated that the ATIS (Alliance for Telecommunications Solutions) approved industry consensus process would be followed. He reviewed the consensus process and explained the method by which consensus is determined. In addition, Mr. Milby stated that the minutes would be comprised of consensus items. Nonconsensus items would be included in the minutes if the sponsoring party provided a written Statement for the Record. Such statements may be conveyed at any point during the meeting.

Additionally, Mr. Milby explained that the following guidelines apply in determining consensus during a conference call meeting: NANPA will ask the participants to identify themselves and the company they work for at the beginning of the call. At that time, NANPA will determine whether enough companies and industry segments are on the call to warrant continuing. Silence on the part of the participants will be considered agreement with a proposal, based on those on the call at the time consensus is called. During the course of the meeting, some participants may, for any reason, choose to drop off the call without announcing their departure. The departure of participants will not affect the agenda. NANPA will not necessarily determine who remains on the call when each consensus question is called. If it appears that consensus will be difficult to achieve on a given issue, or if an issue becomes controversial, NANPA may opt to poll the attendees to determine who is still participating. At any time during the call, a participant may request a poll of the attendees.

**PURPOSE OF THE CALL**

Mr. Milby stated that the Tennessee Regulatory Authority requested that NANPA withdraw the relief plan for the 615 NPA that was filed by NANPA on behalf of the Industry on August 31, 1999. Pursuant to the NPA Code Relief Planning and Notification Guidelines, Section 5.10, NANPA convened this conference call to discuss the possible withdrawal of the relief plan petition. The new forecasted exhaust of the 615 NPA is 4Q2010.

**CO CODE ADMINISTRATION STATUS OF THE TENNESSEE 615 NPA**

Sandy Tokarek, Regional Director - Code Administration – NANPA, provided a read-out of the monthly CO Code Assignment Activity for the Tennessee 615 NPA (See Attachment #2). She reported that there are currently 201 NXX codes available for assignment, 576 assigned NXX codes and 23 unavailable NXX codes.

**POOLING ADMINISTRATION STATUS OF THE TENNESSEE 615 NPA**

Dora Wirth, NeuStar - Pooling Administration reported that pooling forecasts zero additional NXX codes are required for the next six to twelve months.

**TENNESSEE REGULATORY REQUEST TO WITHDRAW RELIEF PLAN**

The Industry reviewed the request from the Tennessee Regulatory Authority to withdraw the relief plan and discussion ensued concerning withdrawing the petition for relief. A proposal was made and consensus reached to withdraw the relief plan filed with the Tennessee Regulatory Authority on August 31, 1999.

**REVIEW OF DRAFT LETTER TO WITHDRAW RELIEF**

The industry reviewed and approved the draft letter to withdraw the relief plan.

**REVIEW OF DRAFT MEETING MINUTES**

Consensus was reached that the draft filing to withdraw relief and the draft minutes resulting from this meeting will be distributed to the Industry on or before September 23, 2003. Agreement was also reached to send any corrections to Wayne Milby at [wayne.milby@neustar.biz](mailto:wayne.milby@neustar.biz) by September 30, 2003 instead of holding a conference call to review and approve the draft filing and meeting minutes. Consensus was also reached to file a notification to withdraw relief with the Tennessee Regulatory Authority no later than October 7, 2003.

Adjourned

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**615 NPA - TENNESSEE  
WITHDRAWING RELIEF CONFERENCE CALL  
SEPTEMBER 9, 2003**

**ATTENDEES**

<b>NAME</b>	<b>COMPANY</b>
Bernard Sparks	BellSouth
Valerie Endlich	Cricket Communications
Belinda Haslett	Cricket Communications
Debra Gooden	MCI
Wayne Milby	NANPA Relief Planning
Joe Cocke	NANPA Relief Planning
Sandy Tokarek	NANPA Code Administration
Tim Booth	NeuStar – Pooling Implementation
Dora Wirth	NeuStar – Pooling Administration
Pat Maroney	Sprint PCS
Lewis DeBoard	Tennessee Regulatory Authority
Bea McKoy	US LEC

Tennessee  
NPA 615 NXX Summary  
Data as of August 31, 2003

Attachment #2

<b><u>NPA</u></b>	<b><u>615</u></b>					
Assigned NXXs	576					
Protected NXXs	0					
Reserved NXXs	0					
Unavailable NXXs	23	See Note				
Available NXXs	201					
Total	800					
<b><u>Codes Assigned NPA 615</u></b>	<u>01/2002</u>	<u>02/2002</u>	<u>03/2002</u>	<u>04/2002</u>	<u>05/2002</u>	<u>06/2002</u>
	1	0	6	0	1	1
	<u>07/2002</u>	<u>08/2002</u>	<u>09/2002</u>	<u>10/2002</u>	<u>11/2002</u>	<u>12/2002</u>
	1	0	1	0	0	1
	<u>01/2003</u>	<u>02/2003</u>	<u>03/2003</u>	<u>04/2003</u>	<u>05/2003</u>	<u>06/2003</u>
	0	0	0	0	0	0
	<u>07/2003</u>	<u>08/2003</u>				
	3	0				
<b>Note: Unavailable indicates codes that are unavailable for assignment. These codes include, but are not limited to, test and special use codes (e.g., 958, 959, 555, time), N11 and other unique codes (e.g., 976, 950), codes set aside for pooling, and codes with special dialing arrangements (e.g., 7-digit dialing across NPA boundary).</b>						